

Pickens County Branch of the NAACP, et al v. School District of Pickens County.
Civil Action No. 8:23-cv-01736-BHH

Exhibit E

**To School District of Pickens County's Response in Opposition to Plaintiffs' Motion for
Preliminary Injunction**

Declaration of Brian D. Swords

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION**

Pickens County Branch of the NAACP;

Rebecca Turner and Brandon Turner, on behalf of
minor children J.T. and G.T.;

Susanna Ashton and Peter Laurence on behalf of
minor children H.L. and C.L.;

Reba Kruse and Derrick Kruse on behalf of minor
children S.K. and R.K.,

Plaintiffs,

v.

School District of Pickens County,

Defendant.

Case No. 8:23-cv-01736-BHH

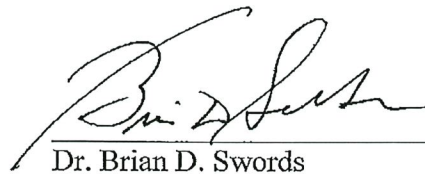
DECLARATION OF DR. BRIAN D. SWORDS

I, **BRIAN D. SWORDS**, declare pursuant to 28 U.S.C. § 1746 as follows:

1. My name is Brian D. Swords. I am over the age of 18 and am competent to make this declaration. I am a citizen and resident of South Carolina. The facts stated herein are true of my own personal knowledge, and if called to testify, I would so testify.
2. I have a Bachelor's degree in business administration and management from Southern Wesleyan University; a Master's degree in Technology and Human Resources Development from Clemson University; a Ph.D. in Educational Leadership and Administration from Clemson University; and I have conducted post-doctoral research and studies in educational and instructional technology at the University of North Carolina at Chapel Hill.
3. I hold professional licenses or certifications in instructor/program design and online program design, and I am a Certified Government Chief Information Officer.
4. I have professional training and experience in the law of education and in the selection and development of curriculum, classroom materials, training materials, and school resources.
5. I served for 28 years as a Dean and, later, the Executive Director of Campuses and Training Centers, at Tri-County Technical College in Upstate South Carolina. For ten of those years, I also served on the faculty at the College.

6. For the past three years, I have served as the Vice President of Southern Wesleyan University.
7. In addition, during my career, I have served as an adjunct faculty member at Southern Wesleyan University and Clemson University teaching classes on instructional design, instructional technology, business, and human resources development.
8. I served on the Board of Trustees of the School District of Pickens County from early 2014 through late 2022.
9. In my role as a member of the Board, I voted on September 26, 2022 to remove the book *Stamped: Racism, Antiracism, and You* ("*Stamped*") from the curriculum, library, and media centers of School District of Pickens County high schools.
10. In deciding how to vote in that meeting on the motion to remove *Stamped*, I reviewed and considered the school-level and district-level committees' findings, conclusions, and recommendations regarding the use of *Stamped* in the curriculum, library, and media centers of the School District of Pickens County high schools.
11. In deciding how to vote in that meeting on the motion to remove *Stamped*, I carefully considered the rights, freedom, and responsibilities of students, parents/legal guardians, and teachers in the School District of Pickens County.
12. My recommendation and vote on the motion to remove *Stamped* were based on the school-level and district-level committees' reports, input from stakeholders, and my own independent evaluation of the book, its educational suitability, and the potential for disruption of the educational environment.
13. I do not object to including books, materials, ideas, or discussion in the curriculum and school libraries of the School District of Pickens County regarding race, racism, slavery, the civil rights movement, and historic or contemporary issues and tensions regarding race, racism, and justice, if those books, materials, ideas, or discussions are intellectually appropriate, age appropriate, and educationally suitable for the students of the School District of Pickens County.
14. My decision to vote on September 26, 2022 to remove *Stamped* from the curriculum, library, and media centers of School District of Pickens County high schools was the result of my analysis of the factual errors and omissions in *Stamped* and my conclusion that, as a result of these factual errors and omissions, the book is not intellectually appropriate or educationally suitable for students in the School District of Pickens County.
15. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 7th day of July, 2023.



Dr. Brian D. Swords